

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

JEFFREY ALONZO SIMMS	)	
	)	
	)	
Plaintiff	)	C.A. No. 04-1205-SLR
	)	
v.	)	
	)	
HARRY M. FREEMAN, M.D., ET AL	)	JURY OF 12 DEMANDED
	)	
Defendants.	)	

**NOTICE OF RECORDS DEPOSITION**

TO: Jeffrey Alonzo Simms	Department of Corrections
SBI #198625	Bureau Chief Joyce Talley
Delaware Correctional Center	245 McKee Road
1181 Paddock Road	Dover, DE 19904
Smyrna, DE 19977	

**PLEASE TAKE NOTICE** that the undersigned will take the deposition *duces tecum* of the Records Custodian for Delaware Correctional Center relating to medical records of Jeffrey Alonzo Simms at the offices of McCullough & McKenty, P.A., 1225 N. King Street, Suite 1100, Wilmington, Delaware 19801, on Thursday, January 5, 2006, beginning at 2:00 p.m.: **Note:** **Personal appearance is waived if the materials are received in our office prior to the date of deposition.**

**McCULLOUGH & McKENTY, P.A.**

/s/ Dana M. Spring

Daniel L. McKenty, Del. Bar No. 2689

Dana M. Spring, Del. Bar No. 4605

1225 N. King Street, Suite 1100

P.O. Box 397

Wilmington, DE 19899-0397

(302) 655-6749

Attorneys for Defendant Roberta F. Burns, M.D.

Dated: December 21, 2005

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DISTRICT OF DELAWARE**

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Plaintiff	)	C.A. No. 04-1205-SLR
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	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

I, **DANA M. SPRING**, hereby certify that on the 21<sup>st</sup> day of December, 2005, two  
(2) copies of the attached *Notice of Records Deposition* were sent to the following via first class  
mail, postage pre-paid:

Jeffrey Alonzo Simms  
SBI #198625  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

Department of Corrections  
Bureau Chief Joyce Talley  
245 McKee Road  
Dover, DE 19904

**McCULLOUGH & McKENTY, P.A.**

/s/ Dana M. Spring  
Daniel L. McKenty, Del. Bar No. 2689  
Dana M. Spring, Del. Bar No. 4605  
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Attorneys for Defendant Roberta F. Burns, M.D.